

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

5:21-cv-844-XR

LULAC TEXAS, et al.,

Plaintiffs,

v.

JANE NELSON, et al.,
Defendants.

1:21-cv-0786-XR

**DISTRICT ATTORNEY OGG'S OBJECTIONS TO
LULAC PLAINTIFFS' EXHIBIT LIST**

TABLE A – LULAC PLAINTIFFS’ EXHIBIT LIST			
PX No.	Description	Objections	
LULAC -01	Texas Senate Bill 1 Enrolled Version		
LULAC -02	February 28, 2022 Expert Report of Dr. Kenneth R. Mayer (also available at ECF No. 639-6)	FRE 702, 801 et seq.	
LULAC -03	April 29, 2022 Supplement to Expert Report of Dr. Kenneth R. Mayer	FRE 702, 801 et seq.	
LULAC -04	March 6, 2023 2022 General Election Expert Report of Dr. Kenneth R. Mayer (as modified by the April 20, 2023 expert report)	FRE 702, 801 et seq.	
LULAC -05	April 28, 2022 Expert Report of Dr. Allan Lichtman	FRE 702, 801 et seq.	
LULAC -06	February 28, 2022 Expert Report of Dr. Loren Collingwood	FRE 702, 801 et seq.	
LULAC -07	April 29, 2022 Supplement to the Expert Report of Dr. Loren Collingwood	FRE 702, 801 et seq.	
LULAC -08	February 10, 2023 General Election Report of Dr. Loren Collingwood (as modified by February 27, 2023 notice of correction)	FRE 702, 801 et seq.	
LULAC -09	ECF No. 639-1 Declaration of Zeph Capo	FRE 602, 701, 801 et seq.	
LULAC -10	ECF No. 639-2 Declaration of Domingo A. Garcia	FRE 602, 701, 801 et seq.	

LULAC -11	ECF No. 639-3 Declaration of Gene Lantz	FRE 602, 701, 801 et seq.
LULAC -12	ECF No. 639-4 Declaration of Ameer Patel	FRE 602, 701, 801 et seq.
LULAC -13	ECF No. 639-7 May 6, 2022 30(b)(6) Dep. Tr. of Keith Ingram	
LULAC -14	ECF No. 639-8 April 26, 2022 30(b)(6) Dep. Tr. of Keith Ingram	
LULAC -15	ECF No. 639-9 May 2, 2022 SOS's Responses and Objections to U.S. Interrogatories	
LULAC -16	ECF No. 639-10 May 11, 2022 Attorney General's Verification of State Defendant's Responses and Objections to U.S. Interrogatories	
LULAC -17	ECF No. 639-11 April 20, 2022 30(b)(6) Dep. Tr. of Callanen	
LULAC -18	ECF No. 639-12 Defendant El Paso County Elections Administrator Lisa Wise's March 31, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories	
LULAC -19	ECF No. 639-13 Defendant Dyana Limon-Mercado's March 23, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories	
LULAC -20	ECF No. 639-14 Defendant Yvonne Ramon's May 10, 2022 30(b)(6) deposition transcript	
LULAC -21	ECF No. 639-15 Defendant Michael Scarpello's April 29, 2022 Rule 30(b)(6) deposition transcript	

LULAC -22	ECF No. 639-18 Defendant Bexar County Election Administrator Jacquelyn Callanen's March 17, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories	
LULAC -23	ECF No. 639-19 Dr. Henry Flores's February 28, 2022 expert report	FRE 702, 801 et seq.
LULAC -24	(Deposition Exhibit) December 12, 2021 Email from the SOS's office	
LULAC -25	(Deposition Exhibit) Black Ballot Rejection Rates	
LULAC -26	(Deposition Exhibit) April 7, 2022 email from Ingram to Rep. Williamson	
LULAC -27	(Deposition Exhibit) Bexar County mailing	
LULAC -28	(Deposition Exhibit) Elections Division Webinar	
LULAC -29	(Document) Ballot Secrecy Envelope	
LULAC -30	(Document) Poll Watchers Guide (2018)	
LULAC -31	(Document) Qualifying Voters on Election Day Handbook (2018)	
LULAC -32	(Document) OAG list of pending election-related fraud prosecutions	
LULAC -33	(Document) Letter from Texas Legislators	
LULAC -34	(Document) HB 3 bill summary	
LULAC -35	(Document) OAG memo regarding SB 1	
LULAC -36	(Document) Blank Carrier Envelope	
LULAC -37	(Document) OAG list of resolved prosecutions of election fraud from 2004 to 2020	

LULAC -70	(Email) from OAG providing list of elections-related fraud	
LULAC -71	(Email) SOS email re “Weekend Comparative Process”	
LULAC -72	(Email) from Mexican American Legislative Caucus to SOS	FRE 801 et seq.
LULAC -73	(Email) Email from voter re “unable to verify my info”	FRE 801 et. seq.
LULAC -74	(Email) Email from voter re “Need Identification Card Number in voter registration database, not old Driver’s License Number”	FRE 801 et. seq.
LULAC -75	(Email) SOS email	
LULAC -76	(Written Discovery) State Defendants’ Responses and Objections to DOJ 2nd ROG	
LULAC -77	(Written Discovery) State Defendants’ Supplemental Responses and Objections to US 2nd ROG	
LULAC -78	(Written Discovery) 2023.02.15 - LULAC Plaintiffs’ RFAs to El Paso DA Defendant	
LULAC -79	(Written Discovery) 2023.02.15 LULAC Plaintiffs’ Interrogatories to El Paso DA Defendant	
LULAC -80	(Written Discovery) Dallas County, Defendant Scarpello Responses and Objections to State Defs Second RFP, First RFAs and Interrogatories	
LULAC -81	(Written Discovery) El Paso County, Defendant Lisa Wise Responses and Objections to State Def 1st RFA and ROG	
LULAC -82	(Written Discovery) 2023.03.17 Bexar County Defendant DA Gonzales R&Os to LULAC Plaintiffs RFAs	